



POLITECNICO
MILANO 1863

POLITECNICO DI MILANO

THE RECTOR

HAVING REGARD TO Italian Law No 168 of 09.05.1989, 'Establishment of the Ministry of Universities and Scientific and Technological Research' and subsequent amendments;

HAVING REGARD TO Law No 241 of 07.08.1990, laying down the 'New rules on administrative procedure and the right of access to administrative documents', and subsequent amendments and additions;

HAVING REGARD to Legislative Decree No 165 of 30.03.2001, laying down the 'General labour regulations for employees of public administrations', and subsequent amendments and additions;

HAVING REGARD TO Law No 190 of 06.11.2012, laying down the 'Provisions for the prevention and repression of corruption and illegality in public administration', and subsequent amendments, in particular Art. 1 para. 51 amending Legislative Decree No 165/2001 with the introduction of Art. 54a entitled 'Protection of public employees who report offences';

HAVING REGARD TO the National Anti-Corruption Plan for the 2013/2016 period, and in particular to the paragraph dedicated to the 'Protection of employees who report offences (so-called "Whistleblower")', whose safeguard measures must be regulated by the Public Administrations and transfused in the relevant 3-year Plan for the Prevention of Corruption;

HAVING REGARD to Legislative Decree No 24/2023 'Implementing Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report violations of Union law and laying down provisions for the protection of persons who report violations of national laws';

HAVING REGARD to the Statute of Politecnico di Milano in force; HAVING REGARD to the current General University Regulations;

HAVING REGARD TO the University Regulations for Administration, Finance and Accounting in force; HAVING REGARD TO the University Code of Ethics and Conduct in force;

HAVING REGARD TO Rectoral Decree No 512/SAGNI of 19.02.2014, issuing the Regulations for the protection of civil servants pursuant to Art. 54bis of Legislative Decree No 165 of 30.03.2001, and subsequent amendments and additions;

ACKNOWLEDGING the favourable opinion expressed by the Academic Senate and the Board of Governors at their respective meetings held on 17 and 25 July 2023, concerning the new Regulations of Politecnico di Milano for the protection of Whistleblowers and for the management of their reports;

RECOGNISING the need to provide for this;

HEREBY DECREES

Art. 1

- 1) For the reasons expressed in the preamble, the Regulations of Politecnico di Milano on the protection of Whistleblowers and for the management of their reports are hereby issued, together with their annexes, which are integral parts of this decree.
- 2) Said Regulations shall enter into force as from the date of issue of the rectoral decree.
- 3) With their entry into force, these Regulations repeals the Regulations for the Protection of public employees who report offences pursuant to Art. 54a of Legislative Decree No 65 of 30.03.2001, issued with Rectoral Decree No 5031 of 25.01.2016.

**REGULATIONS OF POLITECNICO DI MILANO FOR THE PROTECTION OF
WHISTLEBLOWERS AND THE MANAGEMENT OF THEIR REPORTS**

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Art. 1

Purpose and subject matter of these Regulations

- 1) In order to encourage the emergence of offences, behaviours, acts or omissions that harm the public interest or the integrity of its Administration, which may be encountered in the performance of one's own institutional, administrative and contractual activities, Politecnico di Milano defines and regulates the procedures for reporting or denouncing such violations, pursuant to and as a result of the principles introduced by Legislative Decree No 24 of 10.03.2023, "Implementing Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report violations of Union law and laying down provisions for the protection of persons who report violations of national laws", as well as the Code of Ethics and Conduct of Politecnico di Milano.
- 2) Politecnico di Milano establishes an internal channel for the reporting of such offences and regulates the rights granted to Whistleblowers or whoever has filed a complaint with the judicial or accounting authorities or whoever has made a public disclosure, in order to provide them with the maximum protection within the limits and in the manner set out in these Regulations.

Article 2 -

Whistleblowers

- 1) A reporting party (hereinafter the 'Whistleblower') is the natural person who makes the report, public disclosure of information or complaint to the judicial or accounting authorities on violations discovered during his/her work or legal relations with Politecnico di Milano.
- 2) Politecnico di Milano identifies the following as Whistleblowers:
 - a) tenured and contract teaching staff;
 - b) tenured managers;
 - c) technical and administrative staff;
 - d) enrolled students, specializing students and PhD students;
 - e) any person holding a contract with Politecnico di Milano;
 - f) workers and economic operators working at the University.

Art. 3 -

Reports

- 1) For the purposes of these Regulations, 'reports' shall mean the written or oral communication of information on offences, conduct, acts or omissions that harm the public interest or the integrity of one's Administration, which may be encountered in the performance of one's own institutional, administrative and contractual activities.
- 2) There may be three types of reports:
 - a) internal reporting: written or oral communication of information on violations, submitted through the internal reporting channel referred to in Art. 4 below;
 - b) external reporting: written or oral communication of information on violations, submitted through the external reporting channel referred to in Art. 5 below.
 - c) public disclosure: reporting in the press, social media or other mass media, as referred to in Art. 6 below.
- 3) The subject matter of the reports must be:
 - a) violations of national regulations, including: administrative, accounting, civil or criminal offences, ie unlawful conduct as per Legislative Decree No 231/2001 concerning the 'Provisions governing administrative liability, or violations of the organisation and management models provided for therein';

- b) violations of European regulatory provisions, including: offences falling within the scope of European Union laws and in general all acts or conduct that frustrate the object or purpose of the provisions of European Union acts.
- 4) The following cannot be reported:
- a) disputes, claims or demands linked to the personal interests of the Whistleblower, and which relate exclusively to his/her work or public employment relations, including with hierarchically upper levels;
 - b) violations already regulated by European Union or national laws;
 - c) classified information;
 - d) forensic and medical professional secrets;
 - e) secrecy of court deliberations.
- 5) Anonymous reports, ie reports without any element allowing the identity of their author to be traced or made under pseudonyms/nicknames, are treated as ordinary reports.

Art. 4

Internal reporting

- 1) In the case of internal reporting, Politecnico di Milano makes a special reporting channel available managed with a telematics platform which guarantees, via encryption tools, the confidentiality of the Whistleblower and the contents of the report as well as its related documents.
- 2) The platform is published on the University's institutional website at <https://wb.polimi.it>.
- 3) The management of the platform is entrusted to Politecnico di Milano's Corruption Prevention and Transparency Officer (hereafter just 'CPTO'), or his/her delegate, who makes use of specially appointed IT technical support.
- 4) In the case of written reports, the appropriate form on the above-mentioned platform must be used.
- 5) Oral reports may be made in the presence of the CPTO or his/her delegate, who shall immediately formalise the data and contents of the reports using the appropriate form.
- 6) Reports can also be submitted, using the appropriate form, by writing to the e-mail address anticorruzione@polimi.it, whose system guarantees the confidentiality of the Whistleblower's data and the safeguards provided for him/her.
- 7) In the case reports are submitted to a person other than the one provided for in the previous paragraphs, they are transmitted to the CPTO or to his/her delegate within seven days of their receipt and their transmission is simultaneously notified to the Whistleblower.

Art. 5

External reporting

- 1) Whistleblowers can make an external report through the channel specifically set up by the National Anti-Corruption Authority (ANAC).
- 2) ANAC guarantees the confidentiality of the Whistleblower's identity, the contents of the report and any documents. The report is made either in writing via the designated IT platform or orally via telephone lines or voice messaging systems or, at the Whistleblower's request, by means of a face-to-face meeting set within a reasonable period of time.
- 3) It is possible to make an external report if, at the time of its submission, one of the following conditions is met:
 - a) the internal reporting channel of Politecnico di Milano is down;
 - b) the Whistleblower has already made an internal report in the manner provided for in Art. 4 above and there has been no follow-up;

- c) The Whistleblower has reasonable grounds to believe that, if he/she were to make an internal report, it would not be effectively followed up, or that the report might give rise to a risk of retaliation under Art. 7(4) and (5);
- d) the Whistleblower has reasonable grounds to believe that the violation may constitute an imminent or obvious danger to the public interest.

Art. 6 - Public disclosures

- 1) Whistleblowers may make public disclosures in accordance with Art. 3(2)(c) above provided that:
 - a) the Whistleblower has made an internal and external report in the manner provided for in Arts. 4 and 5 above;
 - b) the Whistleblower has reasonable grounds to believe that the violation may constitute an imminent or obvious danger to the public interest;
 - c) the Whistleblower has reasonable grounds to believe that the external report may entail a risk of retaliation or may not be effectively followed up due to the specific circumstances of the case, such as where evidence may be concealed or destroyed, or where there is a reasonable fear that the recipient of the report may be colluding with the perpetrator of the violation or involved in the violation itself.

**Art. 7
Protection of Whistleblowers**

- 1) Politecnico di Milano shall provide the appropriate protection measures for Whistleblowers in the following cases:
 - a) at the time of the report or the filing of the report with the judicial or accounting authorities or the public disclosure, the Whistleblower (or the person denouncing the fact) had reasonable grounds to believe that the information about the reported, denounced or publicly disclosed violations was true and fell within the objective scope of these Regulations;
 - b) the report or public disclosure was made based on the provisions of the preceding articles of these Regulations.
- 2) The protection of Whistleblowers also applies if the report, the complaint to the judicial or accounting authorities or the public disclosure of information occurs in the following cases:
 - a) when the legal relation with Politecnico di Milano has not yet started, if information on violations has been acquired during the selection process or in other pre-contractual stages;
 - b) during the probationary period;
 - c) after the termination of the legal relation, if the information on violations was acquired during the relation.
- 3) The grounds leading the person to report, denounce or publicly disclose are irrelevant to his/her protection.
- 4) Whistleblowers shall not be subject to any retaliation, ie any conduct, act or omission, even if only attempted or threatened, carried out by reason of the reporting, denouncing to the judicial or accounting authorities or public disclosure, and which causes or may cause the Whistleblower (or the person denouncing the fact), directly or indirectly, unjust damage.
- 5) Retaliatory conduct includes, but is not limited to:
 - a) dismissal, suspension or equivalent measures;
 - b) non-promotion;
 - c) change of duties, change of workplace, change of working hours;
 - d) suspension of training or any restriction of access to it;
 - e) demerit remarks or negative references;
 - f) coercion, intimidation, harassment or ostracism;

- g) discrimination or otherwise unfavourable treatment;
 - h) early termination of a fixed-term employment contract;
 - i) damage, including to the person's reputation (particularly on social media), or economic or financial harm, including loss of economic opportunities and loss of income;
 - j) early termination or cancellation of the contract for the supply of goods or services;
 - k) cancellation of a licence or permit;
 - l) request for psychiatric or medical examinations.
- 6) The protection and safeguard measures set out in these Regulations also apply to:
- a) the facilitator, ie the natural person assisting the Whistleblower (or the person denouncing the fact) in the reporting process and operating within the same work environment;
 - b) persons in the same work environment as the Whistleblower (or the person denouncing the fact) and who are related to them by a stable emotional or family link up to the fourth degree of kinship;
 - c) habitual tablemates of the Whistleblower (or the person denouncing the fact).
- 7) The protections provided for in this Article are not guaranteed to the Whistleblower (or the person denouncing the fact) if criminal liability for the offences of defamation or slander, or civil liability in cases of wilful misconduct or gross negligence, is established. A disciplinary sanction is imposed in such cases.
- 8) The provisions of this Article also apply in cases of public reporting or disclosure provided anonymously, if the Whistleblower is subsequently identified and retaliated against.

Art. 8

Support measures and protection against retaliation

- 1) Politecnico di Milano hereby states that, pursuant to current legislation, a list of Third Sector entities providing support measures to Whistleblowers has been set up at ANAC. Said list is published on the university's website.
- 2) Such support measures consist of information, assistance and advice free of charge as stipulated in Art. 18(2) of Legislative Decree No 24/2023.
- 3) Whistleblowers, whether entities or persons, are entitled to inform ANAC of the retaliation they believe they have suffered, in accordance with the provisions of Art. 19 of Legislative Decree No 24/2023.

Art. 9

Conflict of interest of CPTOs

- 1) In the event that the report of offences involves the CPTO or the latter is otherwise in a situation of conflict of interest, the procedure for managing the report is delegated to the Rector.

Art. 10

Confidentiality obligation and Personal Data Processing

- 1) The identity of the Whistleblower and any other information from which that identity may be inferred, directly or indirectly, may not be disclosed without the Whistleblower's express consent to persons other than the CPTO (or his/her delegate).
- 2) The CPTO (or his/her delegate) and the technical support staff protect the identity of the Whistleblower, the identity of the persons involved and the identity of the persons mentioned in the report until the conclusion of the proceedings initiated as a result of the report and with the same guarantees as those provided for the Whistleblower.
- 3) In the context of a specific report, personal data will be processed which is adequate, relevant and limited to what is necessary in relation to the purposes, pursuant to Art. 5(1)(c) of Regulation No 679/2016 (data minimisation).

- 4) The rights of the data subject referred to in Arts. 15 to 22 of EU Regulation No 679/2016 may not be exercised by making a request to the data controller or by lodging a complaint, if the exercise of such rights may result in actual and concrete prejudice to the confidentiality of the identity of the person reporting violations of which he/she has become aware by reason of his/her employment relationship or functions performed, pursuant to Art. 2 - undecies, para. 1, letter f) of Legislative Decree No 196 of 30.06.2003 and subsequent amendments.
- 5) Politecnico di Milano, the CPTO (or his/her delegate) and the technical support staff identify technical and organisational measures suitable to guarantee a level of security appropriate to the specific risks arising from the processing operations performed.

Art. 11

Management of reports and consequent fulfilments

1) Preliminary examination of the report.

On receipt of the report, the CPTO (or his/her delegate) carries out an initial analysis of the content of the facts being reported and verifies whether the report can be traced back to the institution of reporting offences and whether the objective and subjective prerequisites and requirements laid down in the legislation in force are met in order to grant the Whistleblower the protection to which he/she is entitled. Said checks must be completed within 15 working days, starting from the date the report is received.

2) Preliminary investigation.

- a) Based on an assessment of the facts being reported, the CPTO may decide to file the report if it is manifestly unfounded. In this case, he/she may decide to initiate disciplinary proceedings before the University Disciplinary Authorities in accordance with the provisions of the Code of Ethics and Conduct and the relevant Organisational and Operating Regulations.
- b) If the preliminary examination shows that the report is well-founded, in whole or in part, the CPTO (or his/her delegate), for the purposes of carrying out the preliminary investigation, may initiate a dialogue with the Whistleblower, asking him/her for clarifications, documents and further information, again through the channel of the designated IT platform or, if the Whistleblower agrees, even in person. Where necessary, the Data Protection Officer (or his/her delegate) may also acquire deeds and documents from other offices of the Administration, make use of their support and involve persons from outside the University, guaranteeing the utmost confidentiality of the reported person and the protections provided for by these Regulations. The time limit for finalising the investigation is sixty days starting from the date of its commencement. Where necessary, this time limit may be extended by the CPTO, under the condition he/she provides full reasons therefore.

3) Measures concluding the preliminary investigation.

If, at the outcome of the preliminary investigation, the report appears to be well founded, in whole or in part, the CPTO, in relation to the nature of the violation and the profiles of unlawfulness found, will assess whether to:

- file a complaint with the competent judicial authority;
- notify the outcome of the inspection to the person in charge in the place to which the author of the violation belongs, so that he/she may take the measures falling within his/her competence, including disciplinary action;
- notify the outcome of the inspection to the competent disciplinary authority so that the due measures may be taken;
- forward the report to the Court of Auditors;
- forward the report to ANAC;
- forward the report to the Civil Service Department.

4) Conclusion of the proceeding.

The proceeding must be concluded no later than 120 days from receipt of the report, including any extensions.

Art. 12

Retention of documents relating to reports

- 1) The reports and their documentation are kept at the CPTO's Secretariat for the time needed to process the report and, in any case, no longer than five years from the notification date of the final outcome of the reporting.
- 2) Subject to the Whistleblower's consent, the oral report made with the CPTO (or his/her delegate) is documented by the staff member in charge by recording it on a device suitable for storage and listening or by preparing an appropriate report. In this case, the Whistleblower may verify, correct and confirm the minutes of the meeting by signing them.
- 3) In the case of an anonymous report or a report treated as such, its documentation will be kept no longer than five years from the date of receipt.
- 4) Reports and their documents must be entered and registered in the appropriate register.

Art. 13

Administrative Sanctions and Disciplinary Sanctions

- 1) ANAC imposes administrative and pecuniary sanctions in the following cases:
 - a) from EUR 10,000 to EUR 50,000 when it establishes either that retaliation was committed or that the report was obstructed or that an attempt was made to obstruct it or that the obligation of confidentiality under Art. 10 above has been breached;
 - b) from EUR 10,000 to EUR 50,000 when it establishes either that no reporting channels have been established or no procedures for making and managing reports have been adopted or the adoption of such procedures does not comply with those referred to in Arts. 4 and 5, as well as when it establishes that no verification and analysis of the reports received has been carried out;
 - c) from EUR 500 to EUR 2,500 in the case referred to in Art. 7(7), unless the Whistleblower has been convicted, even at first instance, of the offences of defamation or slander or, in any event, of the same offences committed with the report to the judicial or accounting authorities.
- 2) Disciplinary sanctions against Whistleblowers and persons who have a legal relation with Politecnico di Milano shall be imposed by the University Disciplinary Authorities in accordance with the provisions set out in the Code of Ethics and Conduct and the relevant organisational and operating regulations, as well as in accordance with the provisions set out in Art. 11 above of these Regulations.

Art. 14

Annexes

- 1) Annexes to these Regulations are:
 - a) Facsimile of the Form for the reporting of offences pursuant to Legislative Decree No 24 of 10.03.2023, with accompanying Instructions for Compilation;
 - b) Privacy policy pursuant to Art. 13 of Regulation (EU) No 679/2016 of 27.04.2016.
- 2) Any changes and updates to the aforementioned forms shall be made immediately by the competent Administration Service.

Art. 15

Transitional and final provisions

- 1) These Regulations are published on Politecnico di Milano's institutional website at <https://wb.polimi.it> and comes into force from the date of their publication.
- 2) With the entry into force of the new Regulations of Politecnico di Milano for the protection of Whistleblowers and the management of their reports, reports may also be submitted using the e-mail address anticorruzione@polimi.it, as regulated

by the Regulations for the Protection of public employees pursuant to Art. 54bis of Legislative Decree No 165 of 30.03.2001, by the Protocol for the management of reports of unlawful conduct made by Politecnico di Milano employees and related forms of protection annexed thereto and by these Regulations in Art. 4, para. 6 above.

- 3) Until the date of entry into force of the new Regulations of Politecnico di Milano for the protection of Whistleblowers and the management of their reports, reports submitted to Politecnico di Milano are governed in accordance with the procedures set out by the Regulations for the Protection of public employees pursuant to Art. 54bis of Legislative Decree No 165 of 30.03.2001.

THE RECTOR
Prof. Donatella Sciuto

Digitally signed in accordance with the eGovernment Code and subsequent amendments and additions.



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FORM FOR THE REPORTING OF OFFENCES PURSUANT TO LEGISLATIVE DECREE NO 24 OF 10.03.2023

Data of the Whistleblower*

NAME	<input type="text"/>						
SURNAME	<input type="text"/>						
TAX CODE	<input type="text"/>						
ADDRESS	<input type="text"/>						
CATEGORY PROFESSIONAL (please tick the applicable box)	<table><tr><td><input type="checkbox"/> Teaching staff</td><td><input type="checkbox"/> Person holding a contract with Politecnico di Milano</td></tr><tr><td><input type="checkbox"/> Managerial staff or Technical/Adimistrative staff</td><td><input type="checkbox"/> Worker or economic operator working at the University</td></tr><tr><td><input type="checkbox"/> Student, postgraduate, doctoral student</td><td><input type="checkbox"/> Other</td></tr></table>	<input type="checkbox"/> Teaching staff	<input type="checkbox"/> Person holding a contract with Politecnico di Milano	<input type="checkbox"/> Managerial staff or Technical/Adimistrative staff	<input type="checkbox"/> Worker or economic operator working at the University	<input type="checkbox"/> Student, postgraduate, doctoral student	<input type="checkbox"/> Other
<input type="checkbox"/> Teaching staff	<input type="checkbox"/> Person holding a contract with Politecnico di Milano						
<input type="checkbox"/> Managerial staff or Technical/Adimistrative staff	<input type="checkbox"/> Worker or economic operator working at the University						
<input type="checkbox"/> Student, postgraduate, doctoral student	<input type="checkbox"/> Other						
If you answered 'Other' please specify	<input type="text"/>						
Professional qualification or position at the time of the reported events	<input type="text"/>						
Qualification or current position	<input type="text"/>						
Place of employment	<input type="text"/>						
Telephone <input type="text"/>	E-mail <input type="text"/>						



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* **Providing personal data is optional.** However, failure to provide the data may jeopardise the investigation related to the report: anonymous reports will only be taken into account if they are adequately substantiated and made with a wealth of details, so as to bring out facts and situations in specific contexts.

Data and information relating to reporting

Physical place where the fact occurred	<input type="text"/>	
Period or date when the fact occurred (dd/mm/yyyy)	<input type="text" value="from to"/>	<input type="text"/>
Conduct duration illegal	<input type="text" value="has ended"/>	<input type="text" value="is still ongoing"/>
	<input type="text" value="occurs repeatedly"/>	
Person(s) who has/have committed the fact (please state: name, surname, title, role in the incident, contact details)	<input type="text"/>	
Any private entities involved (Please state: name, surname, qualification, role in the incident, contact details)	<input type="text"/>	
Any legal persons involved (Please state: company name, type of entity/company, registered office address, VAT number, role in the incident, contact details)	<input type="text"/>	
Ways of becoming aware of the fact	<input type="text"/>	
Any other subjects who can report on the fact (please state: name, surname, title, contact details)	<input type="text"/>	
Any other entities or other channels to or with which the report was made (please state: name, surname, title, contact details/type of channel)	<input type="text"/>	
Type of unlawful conduct¹	<input type="text"/>	

¹ Types of unlawful conduct: a) Corruption or power abuse; b) Mismanagement of public resources and financial loss; c) Illegal appointments and mandates; d) Illegal procurement; e) Illegal competitions; f) Conflict of interest; g)



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Description of the fact (min. 50 characters)

Violation of the Code of Ethics and Conduct and other provisions of disciplinary relevance; h) Damage to the University's image; i) Violation of environmental or occupational safety regulations; l) Failure to activate anti-corruption regulations; m) Adoption of discriminatory measures; n) Other (specify).



PRIVACY POLICY FOR THE COLLETION AND PROCESSING OF PERSONAL DATA PURSUANT TO ART. 13 OF REGULATION (EU) NO 679/2016 OF 27 APRIL 2016

The current Information Notice is issued in accordance with Art. 13 of Regulation (EU) No 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and in compliance with the law on the processing of personal data and the free movement of such data.

In particular, this Information Notice refers to reports of offences (so-called ‘whistleblowing’), within the framework of the Regulations of Politecnico di Milano for the protection of Whistleblowers and for the management of their reports, pursuant to Legislative Decree No 24 of 10.03.2023.

Data Controller

Politecnico di Milano - Director General delegated by the pro-tempore Rector - contact: dirgen@polimi.it

Data Protection Officer and contact points

Email: privacy@polimi.it - tel. + 39 02 23999378.

Purpose of data processing, legal basis, categories of data and retention period.

For the purposes of applying the relevant European and national legislation (Regulation No 679/2016), we inform you that your personal data shall be used for the following purposes:

Intended purpose of the personal data processing	Legal basis of the processing	Categories of personal data subject to processing	Retention period of personal data
Purpose 1 Managing of reports of offences (so-called ‘whistleblowing’).	Legal obligation (Art. 6, para. 1 c) of the EU Regulation as well as Art. 54Bis of Legislative Decree No 165/2001).	<ul style="list-style-type: none"> • Personal details; • Identifying data; • Contact details; • Academic information; • Data on the report. 	The data collected will be kept for a period not exceeding five years from the date of collection and in any case for the duration of any disciplinary/criminal proceedings or proceedings before the Court of Auditors.
	Public interest (Art. 6, para. 1 e) of the EU Regulation.		

Nature of the data

The provision of the data requested for processing is mandatory. In the event of failure to provide the data requested, the planned services/safeguards cannot be guaranteed. Providing



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personal data is in fact necessary and failure to prove them precludes the effective recognition of the protections provided for by the relevant legislation and, in particular, by Art. 54-bis of Legislative Decree No 165/2001.

Processing methods

The processing carried out for the purposes described above can be carried out both on paper and digitally, manually and/or using electronic or, in any case, automated tools.

In particular, the processing is carried out via computerised mode using the tools and means made available by the University, in accordance with the provisions of the regulations in force and the internal provisions of Politecnico di Milano.

The Whistleblower is guaranteed confidentiality through the adoption of appropriate technical and organisational measures to protect personal data.

The data acquired for the aforementioned purposes shall only be accessed by duly authorised and instructed personnel.

Categories of recipients

In connection with the stated purposes, the data may be communicated to the following public entities as recipients:

- National Anti-Corruption Authority (ANAC);
- Court of Auditors;
- Judicial authority.

Finally, personal data may also be disclosed to other public administrations, including in anonymous form in the event that such administrations are obliged to process this data for any proceedings within their institutional competence, as well as to all public entities to which, under the relevant conditions, disclosure is legally required under the provisions of European system, laws or regulations.

Transfer of data to non-EU countries or international organisations

Personal data will be processed by the Data Controller within the European Union.

Rights of the data subject

The data subject has the right to obtain from Politecnico di Milano access to personal data and to ask for rectification, integration, cancellation or restriction of processing, or to object to such processing, pursuant to Arts. 15 et seq. of the EU Regulation and in accordance with the provisions of Art. 2 - undecies, para. 1, letter f) of Legislative Decree No 196 of 30.06.2003 and subsequent amendments and additions. (limitations to the rights of the data subject).

These rights can be exercised by contacting privacy@polimi.it.

If the data subject believes that his/her rights have been violated by the data controller and/or a third party, he/she has the right to lodge a complaint with the Personal Data Protection Authority and/or other competent supervisory authority under the Regulation.